

# TSD File Inventory Index

Date: March 22, 2001

Initial: CMKnewas

Facility Name: <u>Sheffield Steel Corporation (Johel Facility)</u>		
Facility Identification Number: <u>LD 151 759 248</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status <u>A.2</u>	1	.1 Correspondence
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement <u>C.2</u>
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos
.1 Correspondence		.4 RFA Reports <u>D.1.4</u>
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 8

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil Sampling/Groundwater D-2.7(2)	2	D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence D.3.1	1	E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	1
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil Sampling/Groundwater D-3.7(1)	1	.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.  
Comments: \_\_\_\_\_

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April 11, 2000

Deirdre Flannery-Tanaka, Esquire  
U.S. Environmental Protection Agency  
Region V  
Office of Regional Counsel  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: **Sheffield Steel -- Joliet Facility**  
**EPA I.D. No. ILD151759248**

Dear Ms. Tanaka:

We are responding on behalf of Sheffield Steel Corporation ("Sheffield") to the questions you and Patrick Kuefler raised during our conference call on March 23, 2000. Specifically, you requested clarification from Sheffield regarding proposed cleanup plans described in our responses dated January 27, 2000 and September 21, 1999 to EPA's RCRA section 3007 information request. We agreed to provide a written explanation addressing your questions on the applicability of (1) EPA's Used Oil Management Program in 40 C.F.R. Part 279, (2) the Spill Prevention Planning Requirements in 40 C.F.R. Part 112 and (3) the sampling guidance contained in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA Pub. No. SW-846 (1998). We also agreed to provide a work plan describing the proposed characterization and removal of material from the debris pile and to provide additional information regarding oil storage adjacent to the cooling water recirculation tank. We are pleased to provide the following responses.

**A. Applicability of RCRA**

As a preliminary matter, we would like to explain why we believe certain RCRA remediation and regulatory requirements do not apply to the Sheffield-Joliet facility. The Joliet facility is a steel rolling mill that purchases and processes billets into finished steel fabricated products such as rebar and fence posts. Except for a self-contained metal parts cleaning system, the Sheffield facility does not use chemical products that would result in the generation of a hazardous waste. The spent parts cleaning solvent is routinely recycled by Safety Kleen under an Illinois State regulatory determination that exempts this process from hazardous waste regulation. Because it generates little



or no hazardous waste and does not treat, store or dispose of hazardous waste onsite, Sheffield has never been an interim status facility and does not need a RCRA Part B permit.

The Company does generate modest quantities of spent grease, used oil from equipment maintenance and used petroleum-based metal working fluids from the cooling water recirculation system. We recognize that the Company's handling practices for the used oil and grease and the metal working fluids could be improved, and we are committed to that effort. The drums of used oil and grease observed by Mr. Kuefler during his inspection have been assessed, labeled and processed for recycling or disposal in accordance with Illinois regulations. We described this process in greater detail in our previous responses. As you know, we also have provided work plans for cleaning the concrete pad upon which those drums were stored and for excavating and characterizing areas of petroleum stained soil. We are now performing the assessment and processing of the materials in the debris pile pursuant to a Remediation Work Plan for the refractory brick pile (attached as Exhibit A). Based upon Sheffield's knowledge of the materials and processes used at the Joliet facility, we believe that none of the debris will exhibit a hazardous waste characteristic. However, we will test the material as necessary if our knowledge is insufficient to appropriately characterize any particular material. If some material is determined to be a hazardous waste, Sheffield will submit a revised work plan to address the handling and disposal of such material.

**B. Applicability of RCRA Part 279**

You expressed a concern that Sheffield's used oil practices and the proposed remediation of certain areas of stained soil may not be in compliance with EPA's Used Oil Management Standards set forth in 40 C.F.R. Part 279. Effective October 4, 1996, EPA approved the Illinois Standards for the Management of Used Oil, Ill. Admin. Code Tit. 35, Part 739. The Illinois Standard is similar, although not identical, to the federal regulation for management of used oil in 40 C.F.R. Part 279.

For spills that occurred after October 4, 1996, the Illinois standard requires the used oil generator to do all of the following: (1) stop the release; (2) contain the released oil; (3) properly cleanup and manage the released oil and other materials; and (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service. Ill. Admin. Code Title 35, § 739.122(d). No specific remediation standard applies to spilled used oil, except that the generator must properly cleanup and manage the released oil and other materials.

During our telephone conference, you indicated that the Illinois Used Oil Management Program incorporates the Illinois Tiered Approach to Corrective Action Objectives ("TACO") set forth in Ill. Admin. Code Title 35, Part 742. TACO may be used in conjunction with the procedures and requirements applicable to several Illinois remediation programs, including the Leaking Underground Storage Tank ("LUST") Program (35 Ill. Admin. Code, §§ 731 and 732); the Illinois Site Remediation Program (35 Ill. Admin. Code § 740); and RCRA Part B Permits and Closure Plans (35 Ill. Admin. Code §§ 724 and 725).



The LUST and RCRA Part B Programs clearly do not apply to the Joliet facility. The Illinois Site Remediation Program also, by its own terms, is not applicable to Sheffield-Joliet. This Program applies to a person required or electing to pursue a remediation of a release, including a petroleum release, for the purpose of obtaining a "no further remediation" letter. Sheffield has not elected to pursue the Illinois Site Remediation Program at this time. Therefore, the TACO standards are not required. However, to ensure that its remediation effort is adequate to address all of the petroleum stained soils in the areas described, Sheffield has amended its work plan to ensure that visual and olfactory inspections are conducted after surface soil excavation to evaluate the complete removal of the impacted soil. Sheffield Steel will then confirm removal of all impacted soils by screening the underlying soils for the presence of petroleum residuals. The screening will include a Photo-Ionization Detector ("PID"). A description of the PID sampling protocol is contained in the amendments to the Site Investigation Work Plans, attached as Exhibit B.<sup>1/</sup> The visual, olfactory and PID screening is intended to provide EPA with assurance that the spilled used oil and grease has been remediated as required by Illinois regulations Title 35, § 739.122(d).

**C. Oil Spill Planning Requirements -- 40 C.F.R. Part 112**

You have also asked whether Sheffield-Joliet is subject to the Spill Prevention, Control and Countermeasure Planning requirements of 40 C.F.R. Part 112 ("SPCC"). Part 112 also incorporates separately the oil spill planning requirements of the Oil Pollution Act ("OPA"). Sheffield does not believe that either of these Programs applies to its Joliet facility. However, it has agreed, for business purposes, to prepare an SPCC Plan that meets the requirements of 40 C.F.R. § 112.3.

The OPA requirements apply to a facility that could, because of its location, reasonably be expected to cause substantial harm to the environment by the discharge of oil, if it meets one of the following criteria:

1. The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons; or
2. The facility's total oil storage capacity is greater than or equal to 1,000,000 gallons, and one or more other conditions are met, including lack of secondary containment and proximity to sensitive fish and wildlife populations or public drinking water supplies.

Neither of these criteria applies the Joliet facility. OPA, therefore, is not an issue.

The SPCC Program uses a different set of conditions. Specifically, SPCC Program requirements apply to a non-transportation related on-shore facility with an underground buried

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<sup>1/</sup> Exhibit B includes revised pages for the two Work Plans previously submitted by Sheffield for the concrete pad and the stained soil areas. New text is underlined.



storage capacity greater than 42,000 gallons, or an above-ground storage capacity greater than 600 gallons in one tank, or over 1,320 gallons in total. However, the SPCC Program only applies to such facilities if they could reasonably be expected to discharge "harmful quantities" of "oil" into the navigable waters of the United States.

Sheffield does not have underground oil storage tanks. Sheffield does store drums of petroleum-based metal working fluids, oils and greases for use in the rolling mill. However, the drums are generally stored inside buildings where spills would not reach a navigable water of the United States. Certainly a few drums of used oil and grease are also stored outside on the concrete pad pending recycling. This area is also not near any navigable water of the United States, and therefore a release from one or more of these drums would not be expected to result in the discharge of a "harmful quantity" of oil into any such waters. The mill cooling water recirculation tank is adjacent to a water of the United States; however, the tank is bermed to prevent any spill from reaching a navigable water. In addition, Sheffield has planned in its capital budget to upgrade the cooling water system. This upgrade will also include additional environmental controls.

Notwithstanding our conclusion that SPCC regulatory requirements do not apply, Sheffield does plan to develop an SPCC Plan for the facility. This will be part of an effort to improve overall facility housekeeping and materials management. We would be happy to provide to you a copy of the Plan when it is completed.

**D. Applicability of SW-846**

SW-846, Chapter 9, sets forth guidance on the design and development of sampling plans to evaluate the chemical and physical properties of a solid waste. The guidance recognizes that a sampling plan must be appropriate to the waste and will vary depending upon the variability of the waste. The purpose of the sampling plan is to ensure sampling accuracy (closeness to the true value) and precision (replicability). SW-846, Ch. 9 at 5. The guidance also recognizes that the level of accuracy and precision is related to whether the constituents of concern are close to a regulatory threshold. *Id.* For example, if the chemicals of concern are far below regulatory thresholds, the accuracy and precision of samples is less important. The number of samples appropriate for any waste characterization also depends upon the information that is available before the sampling is undertaken. *Id.* at 9. If the source of the waste is known and the waste is known to be homogenous, authoritative sampling can be used without compromising data validity and reliability.

The sampling plan originally designated by Sheffield's consultants called for placing excavated soil into drums and removing a sample randomly from the drums for analysis by a TCLP. Sheffield is aware of the chemical constituents of the materials in the spill areas and believes that the materials to be homogeneous across the areas to be excavated. Therefore, authorization sampling would be appropriate. Nevertheless, to improve the accuracy and precision of the Soil Sampling Program, Sheffield is amending its Work Plan. *See* Exhibit B. As revised, the Work Plan calls for each of the three excavation areas to be divided by grid into four sections. In each area, two samples will be collected: one composite and one grab sample. The composite sample will be made up of



discrete samples collected from each quadrant. The composite samples will be analyzed for TCLP metals and semi-volatile organics. The grab sample will be analyzed for TCLP volatile organics.

The soil in the vicinity of the cooling water recirculation tank is actually more significantly impacted by mill scale than oil, but will be analyzed by a TCLP. Based upon prior experience with similar materials, Sheffield expects the TCLP test results to be well below regulatory threshold values. Although the Site Investigation Work Plan for the stained soil areas proposes a minimum number of samples to be tested, Sheffield believes that the sampling results will meet the accuracy and precision requirements of SW-846 for purposes of making a hazardous waste characteristic evaluation. Additional testing will likely be conducted by the disposal facility that will be contracted to accept the waste.

**E. Cooling Water Recirculation Tank Oil Skimming**

During our telephone conference you asked about the process used by Sheffield to recover and store oil that is skimmed from the surface of the water in the Cooling Water Recirculation Tank. This tank is also referred to as a separator. To respond to your question, Sheffield has prepared a process flow diagram for this system. The diagram is attached as Exhibit C. Cooling water from the rolling mill is conveyed to manhole from which it is pumped to the separator. Mill scale settles to the bottom of the tank. Residual oil rises to the surface. Oil is skimmed mechanically from the surface of the separator and stored in a drum placed adjacent to the separator and within a concrete secondary containment wall. This drum is removed and replaced periodically. The drum of recovered oil is recycled. Mill scale is removed from the bottom of the separator via hoses and pumped into the mill scale drying bed. Water and any remaining oil from the mill scale drying bed is pumped into the same manhole from which liquids are pumped to the separator. As you can see, this is a closed loop system. The staining on the ground in the vicinity of the separator and the mill scale drying bed results from incidental releases from the hoses used to pump mill scale from the separator into the drying bed. The released material is primarily mill scale which is a dark iron-based material that appears on the ground to be similar to spilled oil. This area will be excavated as part of the Soil Cleanup Work Plan. Sheffield is also exploring alternatives for the removal of mill scale from the separator tank to prevent future spills and other incidental releases.

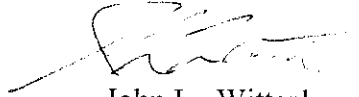
We hope this information responds fully to your questions and concerns. Sheffield is actively engaged in improving its environmental performance, including procedures for handling used oil and general housekeeping. And it is certainly our intention to ensure that the facility's operations conform fully to all environmental requirements, not just RCRA. We believe that our Work Plans and the improvements described herein do just that.



Dierdre Flannery-Tanaka, Esquire  
April 11, 2000  
Page 6

Please let me know if you have any additional questions or would like further clarification of our Work Plans.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Wittenborn", written over a horizontal line.

John L. Wittenborn

JLW:slb

cc: Patrick Kuefler  
Douglas Strickland  
Sarah Monette



51

## **REMEDATION WORK PLAN CLEANING UP REFRACTORY BRICK PILE LOCATED ON CONCRETE PAD**

This plan addresses the steps that will be taken to remove, recycle or dispose of non-hazardous materials located on the concrete pad, also referred to as the "debris pile."

In October 1999, the area was characterized by Huff & Huff. Samples of refractory brick were tested using TCLP and determined not to exhibit a hazardous waste characteristic. After further investigation of the materials discarded in the area, Sheffield has identified the following additional materials: trash, mill scale and open-top drums used to transport mill scale and refractory to the area.

The first phase of the Remediation is to hand sort and remove from the debris pile lumber, refractory, concrete, paper, rags, hoses, tires and empty drums. This phase began on March 27, 2000.

The second phase will be to separate all ferrous scrap, which includes empty drums. Each drum will be separately inspected and characterized. Once each drum has been inspected and determined not to contain a hazardous waste, it will be crushed and processed as scrap metal for remelting.

The next step will be to remove a few abandoned appliances from the debris pile and stage them in a separate area. These appliances will be inspected and properly processed before being disposed of off-site in an environmentally safe manner.

Wood, paper, plastic, rubber hoses, tires, rags, refractory brick, concrete blocks and other trash will be separated and sent to Waste Management's Laraway facility in Elwood, Illinois.

The mill scale will be processed through a ½" screener to separate refractory brick and trash. The refractory brick and trash will be disposed of at Waste Management's Laraway facility. The mill scale will be returned to the mill scale pile located on the northwest corner of the facility and sold.

The equipment being used will consist of an excavator, front-end loader, dump truck and Screen-All screener with ½" screens.

Waste Management will transport all non-hazardous waste to their Laraway facility.





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SITE REMEDIATION WORK PLAN  
CLEANING OF CONCRETE PAD  
SHEFFIELD STEEL CORP.  
JOLIET FACILITY  
USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp.  
Joliet, Illinois

prepared by:

Huff & Huff, Inc.  
James E. Huff, P.E.  
Sarah Monette, P.E.

January 18, 2000  
Revised April 10, 2000



### 3.2 Cleaning Activities

The concrete pad will be scrubbed with Alconox soap, then wet-vacuumed. When cleaning appears complete based upon visual assessment of the pad, the pad will be steam-cleaned, then wet-vacuumed. The water and other residues generated will be captured by the vacuum and drummed. Before work begins, absorbent pigs will be placed around the edges of the pad to absorb waters not captured by the vacuum. The pigs also will be drummed when cleaning is complete.

Each volume of water (cleaning and steam rinse) will be drummed separately for waste characterization. The drums will be disposed of off-site as hazardous or non-hazardous wastes, based upon the waste characterization results.



SITE INVESTIGATION WORK PLAN  
STAINED SOIL AREAS  
SHEFFIELD STEEL CORP.  
JOLIET FACILITY  
USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp.  
Joliet, Illinois

prepared by:

Huff & Huff, Inc.  
James E. Huff, P.E.  
Sarah Monette, P.E.

January 18, 2000  
Revised April 10, 2000



## 2.1 Oil Drum Accumulation Area

The “oil drum accumulation area” is an accumulation area for drums containing non-hazardous waste grease and oil-contaminated absorbent “pigs.” The accumulation area is used for staging the drums before off-site disposal at Land and Lakes non-hazardous landfill. Figure 2-1 depicts the area.

The entire accumulation area is underlain with a bermed concrete pad to avoid direct exposure of the drums to the ground. Some grease and oil has stained the concrete pad and the adjacent ground surface to the east, as observed during USEPA’s August 1999 inspection. The staining is the result of minor leaks and spills during routine drum transfer operations. Approximately 60 square feet of soil are affected; the staining appears to be limited to the ground surface.

Sheffield Steel will excavate the stained soils and place them into drums. Prior to excavation, the stained soils will be sampled to determine whether they are RCRA hazardous wastes (see Section 3). [Note: Sheffield Steel also will steam clean the concrete pad, as outlined in “Site Remediation Work Plan, Cleaning of Concrete Pad,” which is provided under separate cover.]

In addition, Sheffield Steel will confirm removal of all stained soils by screening the underlying soils for the presence of petroleum residuals. The screening will include visual assessment, olfactory assessment, and screening with a photo-ionization detector (PID).

The PID will be used to screen the samples for the presence of VOCs using a closed-cup protocol. A sample of the underlying soil will be placed in a one-pint plastic cup, approximately half-full. A lid will be placed on the cup and the cup will be set aside for approximately 15 minutes in a warmed area to allow the concentration of volatiles in the headspace to come into equilibrium with the concentration of volatiles in the soil. The lid will be slit with a razor knife and the PID probe will be inserted into the headspace. PID responses will be provided in parts per million (ppm) readings. The PID meter has a detection range from 1 ppm to 2,000 ppm, and is calibrated to read in equivalent ppm of benzene. This headspace method allows detection of



volatiles at relatively low detection levels, and the method is reproducible.

Excavation of the soils will continue until these screening procedures confirm that all impacted soils have been removed. Upon completion, the excavation will be backfilled with clean gravel.

## 2.2 Oil Room / Gear Box

An out-of-use gear box is located on the ground outside of the “oil room.” Oils remaining in the gear box overflowed during storm events in 1999. The overflows stained the ground surface, as observed during USEPA’s August 1999 inspection. Approximately 45 square feet of soil are affected; the staining appears to be limited to the ground surface. Figure 2-1 depicts the area of staining.

Sheffield Steel will excavate the stained soils and place them into drums. Prior to excavation, the stained soils will be sampled to determine whether they are RCRA hazardous wastes (see Section 3).

In addition, Sheffield Steel will confirm removal of all stained soils by screening the underlying soils for the presence of petroleum residuals. The screening will include visual assessment, olfactory assessment, and screening with a photo-ionization detector (PID), as described in Section 2.1.

Excavation of the soils will continue until these screening procedures confirm that all impacted soils have been removed. Upon completion, the excavation will be backfilled with clean gravel.

## 2.3 Mill Scale Cooling Tank

The “mill scale cooling tank” is used as a settling tank to remove mill scale and oil from waters used at the facility. The mill scale settles to the bottom the tank, then is scooped out, collected into drums, and disposed of off-site. The oils are skimmed from the top of the tank, collected into drums, and disposed of off-site. Figure 2-1 depicts the mill scale tank area.



The adjacent ground surface directly to the south of the tank is stained with a material that appears to be oil, as observed during USEPA's August 1999 inspection. Approximately 100 square feet of soil are affected; the staining appears to be limited to the ground surface.

Sheffield Steel will excavate the stained soils and place them into drums. Prior to excavation, the stained soils will be sampled to determine whether they are RCRA hazardous wastes (see Section 3).

In addition, Sheffield Steel will confirm removal of all stained soils by screening the underlying soils for the presence of petroleum residuals. The screening will include visual assessment, olfactory assessment, and screening with a photo-ionization detector (PID), as described in Section 2.1.

Excavation of the soils will continue until these screening procedures confirm that all impacted soils have been removed. Upon completion, the excavation will be backfilled with clean gravel.



### 3.3 Soil Sample Locations

Soil samples will be collected from three areas:

- The oil drum accumulation area.
- The oil room / gear box area.
- The mill scale cooling tank area.

For each area, two samples will be collected for analysis: one composite sample and one grab sample.

Composite samples will be collected for analysis of metals and semi-volatile organics. The use of composite samples will help assure representative sampling of the stained areas. Each stained area will be divided into four quadrants. A sample of the stained soils will be collected from the center of each quadrant. The four quadrant samples will then be composited into one sample, which will be analyzed for TCLP metals and TCLP semi-volatile organics.

Composite samples cannot be collected for analysis of volatile organics because the handling could release the volatile constituents. Instead, grab samples will be collected. For each stained area, soil will be collected from the center of each quadrant and field-screened with the PID (as described in Section 2.1). A grab sample then will be collected from the quadrant with the highest PID reading and will be analyzed for TCLP volatile organics.



#### 4.1 Sample Collection

Sampling Method. Soil samples will be collected using a trowel. The samples will be collected from the depth of soil staining, which is expected to be greatest within one foot of the surface.

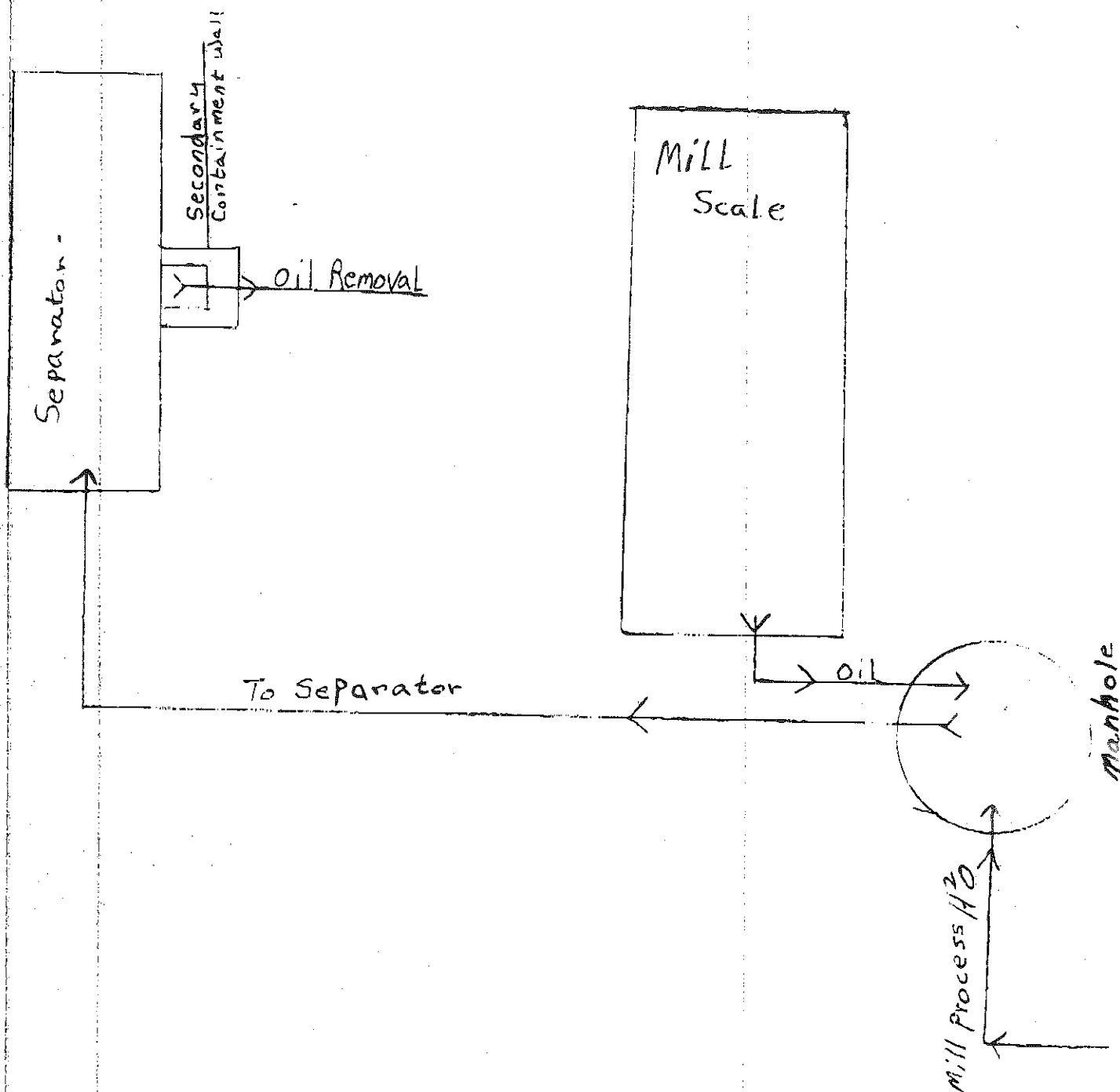
Composite samples and grab samples will be collected (see Section 3.3). For the composite samples, each of the four quadrant samples will be placed into a stainless steel bowl and mixed with the trowel, then the mixed sample will be placed into the sample container. The mixing will help to assure a homogeneous composite sample. Grab samples will be placed directly into the sample container.

Field Screening. Samples will be visually characterized at the time of collection. The characterization will include visual inspection for soil type and color, water content, and contaminant-related materials. Grab samples collected for volatile organic analysis also will be field screened with a PID (see Section 3.3).





River



Joliet Water Flow

14

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January 27, 2000

**VIA FEDERAL EXPRESS**

U.S. Environmental Protection Agency  
Region 5  
Enforcement and Compliance Assurance Branch (DE-9J)  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

ATTN: Patrick Kuefler

**Re: RCRA 3007 Information Request  
Sheffield Steel Corporation  
EPA ID No.: ILD 151 759 248**

Dear Mr. Kuefler:

Sheffield Steel Corporation ("Sheffield") provides the following responses to the U.S. Environmental Protection Agency's ("EPA") Request for Information dated December 9, 1999. EPA's "supplemental" request was issued pursuant to Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927. Sheffield requested and received an extension for replying to EPA's request from Ms. Deirdre Flannery-Tanaka, Esq. in your office. EPA initially requested information from Sheffield on August 3, 1999. Sheffield submitted its response on September 21, 1999. Sheffield's Joliet, Illinois steel mill is not, and never has been, a RCRA treatment, storage, or disposal facility for hazardous waste to the best of its knowledge and belief.

**RESPONSES TO SUPPLEMENTAL REQUEST FOR INFORMATION**

1. In response to Question 1, d., of the August 3, 1999, request for information you state that "Sheffield plans to have the stained soils in the area sampled and remediated in accordance with all applicable local, state, and federal laws." Please provide information about your sampling and remediation activities including, but not limited to, the timetable for sampling and remediation of the area, the sampling parameters, analytical methods, and action levels, and the laws that you believe may be and/or are applicable to the release, sampling and remediation of the area. Please provide a copy



U.S. Environmental Protection Agency - Region 5

January 27, 2000

Page 2

**of all work plans and quality assurance plans developed to address the stained soil and the name of the engineering or environmental consultant hired to perform the work.**

**Response:**

Because there was no question 1, d., of EPA's August 3, 1999 request for information, Sheffield assumes EPA is referring to Sheffield's response to EPA's question 2,d. Sheffield has retained Huff & Huff, Inc. Environmental Consultants to conduct a number of remediation activities at the Joliet, Illinois facility. The enclosed "Site Remediation Work Plan: Stained Soil Areas" provides information responsive to EPA's request. The work associated with this project will commence immediately and be completed by May 2000. At this time, Sheffield does not believe that the stained soils are RCRA hazardous wastes. As set forth in the work plan, Sheffield will conduct TCLP and other analyses of the soil to determine whether the soil exhibits a hazardous waste characteristic.

2. **In your response to Question 3, a., of the August 3, 1999 request for information, you state that "Sheffield plans to remove the oil-stained soils, and have a certified environmental engineering company sample and test the soils. These soils will be disposed of pursuant to all applicable local, state, and federal regulatory requirements." Please provide information about your sampling and remediation activities including, but not limited to, the timetable for sampling and remediation of the area, the sampling parameters, analytical methods, and action levels, and the laws that you believe may be and/or are applicable to the release, sampling and remediation of the area. Please provide copies of all documents which discuss or relate to the oil-stained soils, including, but not limited to, releases, sources of releases, sampling, and sample analyses and clean up activities. Please provide a copy of all work plans and quality assurance plans developed to address the oil stained soils and the name of the engineering or environmental consultant hired to perform the work.**

**Response:**

The stained soils referred to by EPA are addressed by Huff & Huff in the work plan referenced in Sheffield's response to request 1 above. Sheffield knows of no other documents that "discuss or relate to the oil-stained soils."

3. **In response to Question 3, a., of the August 3, 1999 request for information, you state that the spilled oil was from a gear box that over flowed as a result of an "unusually heavy storm event." Please provide the dates of the storm event and spill, and provide copies of all reports and date which discuss and quantify the amounts of rain and material spilled.**



U.S. Environmental Protection Agency - Region 5

January 27, 2000

Page 3

**Response:**

Sheffield has conducted additional research regarding the overflow of stormwater from the exposed gear box. According to this research, no single storm event was responsible for the gear box overflow. Instead, a series of storm events prior to EPA's 1999 inspection of the Joliet site resulted in the filling and overflow of the gear box. The facility does not keep records of storm events, thus it cannot provide the exact dates of the events that caused the gear box to overflow. Sheffield did not record the exact amounts of material that spilled as a result of the overflow. Based upon generator knowledge, the oil is believed not to be a hazardous waste. The oil-stained soil will be excavated and properly characterized as described in the work plan referenced in Sheffield's response to request No. 1 above.

- 4. Please provide the date(s) of the oil and grease spill at the concrete pad located next to the refractory brick piles at the Eastern boundary of the facility.**

**Response:**

Sheffield did not record the dates when oil and grease may have spilled at the concrete pad near the refractory brick pile. After further research and interviewing facility staff, the oil and grease stains probably are the accumulation of small amounts of materials that leaked or spilled over time from drums that were stored on the pad during routine drum transfer operations.

- 5. Please state whether or not Sheffield does, or has ever removed and/or recovered oil from either the cooling water tanks or the mill scale collection basin. If so, please describe when and how this recovery process began and when, if ever, this process was suspended.**

**Response:**

Sheffield installed the "mill scale water treatment cooling tank and containment basin" on June 23, 1971. The tank/basin system removes oil and mill scale from the water so that the water can be recycled and reused at the facility. Through the operation of the system, oils are routinely skimmed from the top of the tank, collected into drums, and disposed of off-site. Since its installation, the system has been shut down only for weekends, holidays, and other periods when no process water is generated or needed. The system never has been shut down for any extended period.

- 6. In your response to Question 3, g., of the August 3, 1999 request for information, you state that the refractory brick will be remediated and hauled to a non-hazardous landfill. Please provide the name and location of the landfill that will be used, the sampling parameters and criteria, and analytical methods as well as the timetable for**



U.S. Environmental Protection Agency - Region 5

January 27, 2000

Page 4

**the sampling and removal. Please provide a copy of all work plans and quality assurance plans developed to address the refractory brick remediation and the name of the engineering or environmental consultant hired to perform the work.**

**Response:**

Sheffield retained Huff & Huff to characterize and dispose of the refractory brick pile. Huff & Huff collected waste characterization samples in October 1999. As a result of its analysis, Huff & Huff has determined that the refractory brick material is non-hazardous. This is consistent with information provided by the refractory supplier as part of the Sheffield Response dated August 3, 1999. The brick will be disposed of at the Waste Management Inc.'s Laraway disposal facility in Elwood, Illinois. Bids for the brick removal were sent to qualified contractors on January 17, 2000. The brick will be removed as soon as a contractor is selected and the work can be scheduled. Sheffield has attached to this response the TCLP analyses results from the refractory brick tests.

7. **Also, in your response to Question 3, d., of the August 3, 1999 request for information, you state that "Sheffield plans to have a certified environmental engineering company steam clean the concrete pad." Please provide information concerning the nature and extent of the spills, and future remediation methods, including, but not limited to, the timetable for cleaning the pad and the removal and testing of residue and water from the operation, and the name and address of the contractor responsible for this clean up activity. In addition, please state which laws you have determined to be applicable to this release, sampling and remediation of the area. Please provide a copy of all work plans and quality assurance plans developed to address the cleaning of the concrete pad and the name of the engineering or environmental consultant hired to perform the work.**

**Response:**

Sheffield has retained Huff & Huff to clean the concrete pad located at the oil drum accumulation area. The enclosed "Site Remediation Work Plan: Cleaning of Concrete Pad" provides information responsive to EPA's request. The work associated with this work plan will begin soon and be completed by May 2000.

8. **In response to Question 3, e., of the August 3, 1999 request for information, you state that "Sheffield plans to have a certified environmental engineering company sample the stained soils observed near the mill scale cooling tank and remediate these soils in accordance with all applicable local, state, and federal regulatory requirements." Please provide information as to the timetable for sampling of the stained areas and state the laws that you believe are applicable to the release, sampling and remediation of the area. Please provide a copy of all work plans and quality assurance plans**



U.S. Environmental Protection Agency - Region 5

January 27, 2000

Page 5

**developed to address the stained soil located near the scale cooling tank and the name of the engineering or environmental consultant hired to perform the work.**

**Response:**

The stained soils referred to in this request are addressed by Huff & Huff in the work plan referenced in Sheffield's response to request 1 above.

9. **The material supplied in response to the August 3, 1999, request for information reflects that the mill scale containment basin and associated tanks are not included in the November, 1994 storm water pollution prevention plan. Please state all the reasons for excluding these areas from the storm water pollution prevention plan.**

**Response:**

The "mill scale containment basin and associated tanks" are part of a closed-loop water treatment and recycling system. This system was designed not to overflow. Thus, oil and other pollutants from the system are not exposed to stormwater that is discharged pursuant to the facility's NPDES stormwater permit. Sheffield believes that this is not an industrial activity that generates stormwater pollution and therefore should not be included in the facility's stormwater pollution prevention plan.

10. **On page 8 of your September 21, 1999 letter, you stated that "Because the Illinois RCRA program operates in lieu of the Federal program, we believe that the resolution of our RCRA regulatory issues with the Illinois EPA fully resolves any concern that EPA may have." Please identify each RCRA regulatory issue you have identified to the Illinois EPA, or has been identified to you by Illinois EPA, and explain when, how and by whom, each issue was resolved. Please provide copies of all documents that purport to discuss or resolve each RCRA regulatory issue. Also, please provide the names of staff at the Illinois Environmental Protection Agency personnel that you contacted or that have been providing oversight for the assessment and remediation of the oil, grease and other spills.**

**Response:**

Sheffield believes that EPA has misconstrued the intent of its September 21, 1999 statement regarding RCRA program delegation authority. Sheffield and its consultants and engineers have sought guidance and information from the Illinois EPA on many environmental matters, including matters relating to RCRA compliance. Sheffield and its consultants have obtained authorization or permits from the Illinois EPA to dispose of solid (nonhazardous) wastes at properly regulated facilities. While the Company has not documented all of these communications – mostly occurring



U.S. Environmental Protection Agency - Region 5

January 27, 2000

Page 6

orally - it believes that the Joliet facility is in compliance with Illinois' solid waste laws. Based on EPA's delegation authority and Illinois' responsibilities thereunder, it seemed logical for Sheffield then to believe that it also is in compliance with federal RCRA requirements.

**11. Provide the following notarized certification by a responsible company officer:**

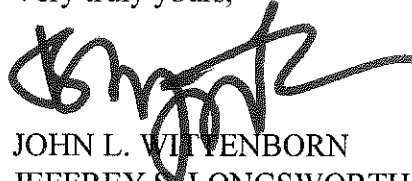
**I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.**

**Response:**

Sheffield has reviewed this letter and the attachments and has attached its signed certification.

We hope these responses clarify EPA's understanding of Sheffield's Joliet facility. Finally, if EPA would like to be present during any of the activities described in this Response or Huff & Huff's work plans, please call to arrange your attendance.

Very truly yours,



JOHN L. WITTENBORN

JEFFREY S. LONGSWORTH

Counsel to Sheffield Steel Corporation

**Attachments**

cc: Doug Strickland (w/o Attachments)  
Frank DiFalco (w/o Attachments)  
Ken Morris (w/o Attachments)  
James Huff (w/o Attachments)



DE-9J

DEC - 9 1999

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Frank Di Falco  
Operations Manager  
Sheffield Steel Corporation  
One Industry Ave.  
Joliet, IL 60434

Re: RCRA 3007 Information Request  
Sheffield Steel Corporation  
EPA ID No.: ILD 151 759 248

Dear Mr. Di Falco:

Thank you for your response of September 21, 1999, to our request of August 3, 1999. Some of the information you supplied in response to the initial request raises additional questions which require clarification. Accordingly, the U.S. EPA is issuing a supplemental request for information in accordance with its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. You are requested to provide information concerning the items shown in Part III of the Information Request.

The information requested in Part III of this letter must be provided to this office within thirty (30) days of receipt of this letter notwithstanding its possible characterization as confidential information. You may, in accordance with 40 CFR 2.203(a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR Part 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.



The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. In addition, any documents submitted to U.S. EPA Region 5 in response to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief.

Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should so notify Region 5. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted in accordance with 18 U.S.C. §1001. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501, et seq.

If you have any questions regarding this matter, please contact Patrick Kuefler of my staff, at (312) 353-6268. Your response should be sent to the U.S. Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Patrick Kuefler.

Sincerely,

Lorna M. Jereza P.E., Chief  
Compliance Section 1  
Enforcement and Compliance Assurance Branch

cc: Todd Marvel, IEPA

BC



bcc: Author's copy  
 ECAB reading file  
 Compliance Section 1 reading file  
 Deirdre Flannery Tanaka, ORC, C-14J

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	<del>SECRETARY</del>	<del>SECRETARY</del>	SECRETARY	SECRETARY	SECRETARY
	<i>ch.d</i>				
AUTHOR/ TYPIST	COMPLIANCE SECTION 1	<del>COMPLIANCE SECTION 2</del> <i>ORC</i>	CORRECTIVE ACTION SECTION	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
<i>RLH 12/2/99</i>	<i>Amg 12/9/99</i>	<i>JMT 12/7/99</i>			



**Collier, Shannon, Rill & Scott, PLLC**

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September 21, 1999

Mr. Lorna M. Jereza  
Illinois/Indiana Section Enforcement  
and Compliance Assurance Branch  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**Re: RCRA § 3007 Information Request;  
Sheffield Steel Joliet Facility**

Dear Mr. Jereza:

On behalf of Sheffield Steel, we are responding to the U.S. Environmental Protection Agency's Request for Information, issued on August 3, 1999 pursuant to section 3007 of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. § 6927. We believe this response fully addresses all information requests, and any concerns or questions you may have regarding Sheffield Steel's Joliet facility. As noted below, the Joliet facility is not and never has been a treatment, storage, or disposal facility for hazardous waste. If EPA has additional questions, please feel free to contact us to discuss the information provided herein.

**Response to Requests for Information:**

**1. Provide copies of any reports developed to assess the actual or potential contamination of soils or groundwater at the site including any phase I and phase II assessment reports developed or completed for the site.**

**Response:** We have enclosed the relevant portions of three reports responsive to your request, including:



Mr. Lorna M. Jereza  
September 21, 1999  
Page 2

1. Preliminary Environmental Assessment dated March, 1988 prepared by Mostardi-Platt Associates, Inc.
2. Soil Boring Investigation dated July 14, 1988 prepared by Mostardi-Platt Associates, Inc.
3. Phase I Environmental Site Assessment of Sand Springs Processing (SSMP) Trading Company dated February, 1999 prepared by SECOR.

*(Attachment A)* As you can see from the reports, activities and operations at the Joliet facility have had little if any impact on the soil or groundwater of the facility.

The Phase I Site Assessment prepared by SECOR found no evidence indicating that underground storage tanks are present on the property. *(Attachment A; SECOR Report, p. 15)* However, the Report indicates that the Illinois Underground Storage Tank (UST) List identifies the Sheffield Steel property as containing a leaking UST. *(SECOR Report, p. 18)*. The UST referenced on the Illinois UST List was removed by Sheffield in 1992. Sheffield sampled and remediated the affected soils surrounding the UST. The remediation included removal of 315 cubic yards of soil, and aided biodegradation on the remaining soil left in place. Illinois EPA approved this remediation in June, 1993. We have attached documentation from Illinois EPA approving Sheffield's removal and remediation. *(Attachment B)*

**2. Provide copies of waste analysis required by 35 I.A.C. § 722.111 (40 C.F.R. § 262.11) including Material Safety Data Sheets (MSDS) and analytical results of any tests performed to determine the presence of hazardous wastes or hazardous waste constituents in the materials listed below:**

**a) Discarded refractory brick including any gunning material used (See photos 10-12). Provide MSDSs for each type of refractory brick used on-site.**

**Response:** We have enclosed Material Safety Data Sheets (MSDSs), prepared by A.P. Green Industries, Inc., for all refractories and gunning material used on site. *(Attachment C)* The MSDSs demonstrate that the bricks contain no chromium or other metals that would render the bricks a hazardous waste. Sheffield has not conducted a TCLP test on the refractory brick or gunning material referenced in Question 2a, nor does it have available any other analytical data for the refractory brick or gunning material. The Joliet facility operates natural gas-fired reheat furnaces used to prepare the pre-cast billets for processing in the rolling mill. In view of the composition of the refractory and the temperature and conditions of the furnaces, Sheffield believes that its



Mr. Lorna M. Jereza  
September 21, 1999  
Page 3

used refractory would not exhibit a hazardous waste characteristic. Therefore, based on its knowledge of the materials, and information from the manufacturer, it has determined that used refractories are not hazardous wastes.

**b) Discarded 1 & 5-gallon containers of material located within the spent refractory brick waste pile.**

**Response:** We have provided copies of photographs of the one (1) and 5 (five) gallon containers referenced in Question 2b. (*Attachment D; Sheffield photographs 1-5*) The metal 5 (five) gallon container exhibited a label demonstrating that it contained Johnson floor finish, which was a supertred, polymer formula. (*Sheffield photographs 3, 4, and 5*) The small one (1) gallon container contained water and what appears to be dried green latex paint. (*Sheffield photographs 1 and 4*) The plastic 5 (five) gallon container contained approximately 3 inches of what appears to be typical dried latex blue paint. (*Sheffield 1 and 2*) These determinations were made based on visual observation since the containers exhibited no labels. Sheffield has no MSDSs or analytical data on these items, and does not believe they were used in the Joliet operations. There is no evidence of any soil discoloration, or any other evidence that releases occurred from these containers.

**c) Mill scale from "wastewater drying beds."**

**Response:** We have enclosed both TCLP data from ARRO Laboratory, Inc. and an MSDS for Sheffield's mill scale. (*Attachment E*) These documents demonstrate the mill scale is not a RCRA hazardous waste.

To our knowledge, no steel mill regards mill scale as a hazardous waste. In fact, mill scale is not even a solid waste. It is instead a by-product of the steel manufacturing process sold by Sheffield as a valuable product. Sheffield sells 100 percent of its mill scale for reuse in steel manufacturing operations to Tube City, Incorporated, P.B. Box M753, Gary, Indiana 46401.

Second, Question 2c references a "wastewater drying bed." However, Sheffield's mill scale is not contained in a wastewater drying bed. The mill scale is generated as a result of the steel-making operations. The Joliet facility purchases steel in billet form. The billets are fed into a natural gas-fired Reheat Furnace and heated to a temperature of approximately 2,100 degrees Fahrenheit. The billets are then continuously fed through stands,



Mr. Lorna M. Jereza  
September 21, 1999  
Page 4

which consist of two rolls that the billets pass through until the required size and shape is achieved. The stands are continually sprayed with water for cooling. During this process, mill scale that flakes off the surface of the billets is carried with the water to the cooling water tanks. The mill scale settles to the bottom of the tank, where a chain conveyor scrapes the mill scale from the bottom of the tank and lifts it over the back wall into a second cell of the tank. From the second tank, the mill scale is transferred via hose to a containment basin, where it is accumulated for storage until it is sold. The mill scale is moved from the basin to trucks to be delivered for sale to Tube City, Inc. *(See Attachment F; Sheffield photographs 6-11 for a pictorial description of the concrete cooling tanks and the mill scale containment basin.)*

**d) Spilled oils shown in Photos 15 and 16.**

**Response:** The area referenced in Question 2d is an accumulation area for drums bearing grease and oil-contaminated absorbent pigs. We have enclosed the Illinois Environmental Protection Agency permit documentation authorizing disposal of the oil and grease-contaminated waste streams at the Land and Lakes landfill. *(Attachment G)* As can be seen from the Illinois EPA documents, these waste streams (980000 and 980020) are non-hazardous.

Note that the entire area used for satellite accumulation is underlain with a bermed, concrete pad to avoid direct exposure of the drums to the ground. These drums are stored in this area until they are shipped to Land and Lakes non-hazardous landfill.

Sheffield has already removed the grease on the ground surface in the accumulation area *(See Attachment H; Sheffield before/after photographs 12-13 of the accumulation area)*. The removed grease was enclosed in a closed top, 55 gallon container. Sheffield plans to have the stained soils in the area sampled and remediated in accordance with all applicable local, state, and federal laws.

We also have enclosed MSDSs prepared by Mobil Oil and Exxon Company for the grease and oil at issue. *(Attachment I)*



Mr. Lorna M. Jereza  
September 21, 1999  
Page 5

**e) Material stored in rusted drums depicted in photos 5, 6, & 7. Include a description of sampling methodologies, and quality assurance/quality control procedures utilized with the sampling activities.**

**Response:** The drums referenced in Question 2e and depicted in EPA photographs 5-7 are currently used for storage of mill scale. We have provided MSDSs and analytical data for the mill scale (*see Attachment E*).

The red drum referenced in the photographs (located north of the oil storage room) originally contained American Chemical Technologies, Inc. FR WG 200-D, Water Glycol Hydraulic Fluid, for which we have provided an MSDS. (*Attachment J*). The blue drum depicted in the photographs originally contained Chempet 6512 Cleaner manufactured by Chempet Corporation. An MSDS for the Chempet 6512 has been provided. (*Attachment K*)

Sheffield has been unable to identify what material was originally contained in the rusted drum depicted in EPA photographs 5, 6, and 7. At the time of the inspection, it contained mill scale and a few pieces of refractory brick. As stated above, MSDSs for refractory brick and the mill scale have been provided.

The drums referenced in Question 2e are used to remove residual mill scale from the concrete pit located beneath the rolling mill. (Holes have been cut in the drums to allow the drums to be lifted by a crane and moved from the cooling bed area.) The drums contained plastic liners to hold their original contents. Prior to using the drums for collection of mill scale, the plastic liners were removed. Accordingly, the mill scale does not mix with any of the original contents.

**3. Provide a description of the status of any soil and/or groundwater investigation at the site and plans for further investigation and/or remediation at the site; specifically:**

**a) Spills located outside the Oil Room (See Photo 9 enclosed).**

**Response:** The staining on the ground outside the oil room is not from leaking drums. The staining is a result of an overflow from the adjacent gear box (depicted in EPA photograph #9) as a result of an unusually heavy storm event. The gear box did not contain any hazardous waste. Sheffield plans to remove the oil-stained soils, and have a certified environmental engineering company sample and test the soils. These soils will be disposed of pursuant to all



Mr. Lorna M. Jereza  
September 21, 1999  
Page 6

applicable local, state, and federal regulatory requirements. Additionally, Sheffield has cleaned the gear box and covered it with a plastic liner in order to prevent rainwater from causing an overflow onto surrounding soils. (*See Attachment L; Sheffield photograph 14 of plastic cover on gear box*)

The drums depicted in EPA photograph 9 and Sheffield photograph 14 are clean, empty drums lined with plastic liners. These drums had contained grease used in Sheffield's operations.

**b) Refractory brick piles (See photos 10-12).**

**Response:** Sheffield is in the process of remediating the refractory brick piles depicted in EPA photographs 10-12. All metal drums were identified and will be removed and recycled as scrap metal. The concrete blocks, lumber, refractories, brick and debris will be removed from the area and hauled to a non-hazardous landfill.

Sheffield recognizes its housekeeping practices can be improved. The Joliet facility is in the process of establishing a better housekeeping system whereby non-hazardous trash is categorized and disposed of accordingly. Sheffield will eliminate the practice of disposing of trash on the refractory brick pile and add marked drop boxes for disposal of various waste materials in this area in order to keep the east side of the facility in good order.

**c) Releases as stained soils shown in photos 15 and 16.**

**Response:** See Response to Question 2d.

**d) Spilled oil and grease on ground and concrete pad. (See photo 17).**

**Response:** See Response to Question 2d. Additionally, Sheffield plans to have a certified environmental engineering company steam clean the concrete pad. The contaminated water and residue from the steam cleaning operation will be collected and disposed of pursuant to all applicable local, state, and federal regulatory requirements.



Mr. Lorna M. Jereza  
September 21, 1999  
Page 7

**e) Stained soil at the "waste water treatment" plant.**

**Response:** As explained in Response to Question 2c above, the Joliet facility does not have a "wastewater treatment plant." Sheffield does not discharge wastewater from its operations. The unit referenced in Question 3e is a mill scale concrete tank containing recirculated process water and mill scale. The mill water cooling system requires make-up water and has no outfall.

Sheffield plans to have a certified environmental engineering company sample the stained soils observed near the mill scale cooling tank and remediate these soils in accordance with all applicable local, state, and federal regulatory requirements.

**4. [Provide copies of] Hazardous waste manifests generated during 1997, 1998, and 1999.**

**Response:** The only hazardous waste generated at the Joliet facility is spent solvent, which is disposed of pursuant to a contractual agreement with Safety Kleen. The quantities of spent solvent fall well within the scope of the small quantity generator thresholds (100 kg - 1,000 kg) under RCRA. The agreement with Safety Kleen meets the requirements of 40 C.F.R. § 262.20(e). Accordingly, Sheffield is exempt from the requirement to prepare manifests for its spent solvent.

We have enclosed copies of Sheffield's LDR Notification Forms for the years 1997, 1998, and 1999 (*Attachments M (1997), N (1998), and O (1999)*). We also have included copies of all Safety Kleen sales service agreements with Sheffield for these solvents for the years requested.<sup>1/</sup>

It should be noted that Sheffield's Joliet facility has always been a small quantity generator (and has never been a treatment, storage, or disposal facility). Information apparently relied on by EPA to target Sheffield's Joliet facility for inspection indicating that the facility was a large quantity generator was inaccurate. (*See Attachment P*)

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<sup>1/</sup> The sales/service agreements are attached to the LDR Notification Forms.



Mr. Lorna M. Jereza  
September 21, 1999  
Page 8

**5. Provide a copy of the current storm water discharge permit for the facility.**

**Response:** A copy of Sheffield's current National Pollutant Discharge Elimination system (NPDES) storm water discharge permit for the Joliet facility is enclosed. (*Attachment Q*)

**6. Provide a notarized certification by a responsible company officer.**

**Response:** *See Attachment R (Certification of Frank DiFalco)* (Attachment R is being sent to EPA via federal express via separate package for delivery on September 22, 1999.)

As noted in our response, all issues pertaining to hazardous and solid waste characterization and management at the Joliet facility are within the jurisdiction of the Illinois EPA pursuant to that State's delegated RCRA Program. The Sheffield Steel Joliet facility is a RCRA small quantity generator that has never stored (for more than ninety days), treated or disposed of hazardous waste at its facility. Because the Illinois RCRA program operates in lieu of the Federal program, we believe that the resolution of our RCRA regulatory issues with the Illinois EPA fully resolves any concerns that EPA may have. Nevertheless, in a spirit of cooperation, we are willing to provide EPA with the information that it has requested and we believe that the information provided in this letter is fully responsive to that request.

We hope this information clarifies any questions you may have regarding Sheffield's Joliet facility. Please call us with any additional questions, or if you would like additional information regarding the facility.

Sincerely,



John L. Wittenborn  
Kathryn McMahon-Lohrer

Enclosure

cc: Doug Strickland  
Frank Di Falco  
Sheffield Steel



**Collier, Shannon, Rill & Scott, PLLC**

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August 18, 1999

Mr. Patrick Kuefler  
U.S. Environmental Protection Agency  
Region 5  
Enforcement and Compliance Assurance Branch (DE-9J)  
77 West Jackson Boulevard  
Chicago, IL 60604

**Re: RCRA 3007 Information Request  
Sheffield Steel Corporation**

Dear Mr. Kuefler:

Thank you for responding to my telephone message to Lorna Jereza earlier today. As I indicated on the telephone, Sheffield Steel is in the process of responding to EPA's RCRA 3007 Information Request related to its Joliet, Illinois facility. I appreciate your willingness to extend the deadline to respond to this request until September 21, 1999.

I look forward to working with you to promptly resolve any questions or concerns EPA may have regarding Sheffield's Joliet facility.

Sincerely,



Kathryn M.T. McMahon-Lohrer

cc: Doug Strickland





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

A

REPLY TO THE ATTENTION OF

AUG 02 1999

DE-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Frank Di Falco  
Operations Manager  
Sheffield Steel Corporation  
One Industry Avenue  
Joliet, Illinois 60434

Re: RCRA 3007 Information Request  
Sheffield Steel Corporation

Dear Mr. Di Falco:

This is a request for information by the United States Environmental Protection Agency (U.S. EPA) in accordance with its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. You are requested to provide information concerning the items shown in Part III of the Information Request.

The information requested in Part III of this letter must be provided to this office within thirty (30) days of receipt of this letter notwithstanding its possible characterization as confidential information. You may, in accordance with 40 CFR Part 2.203(a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR Part 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.

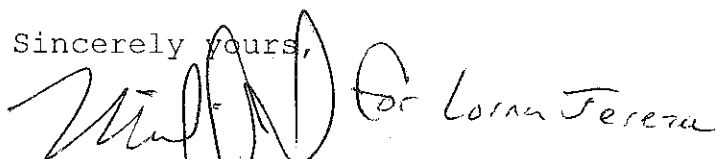


The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. In addition, any documents submitted to U.S. EPA Region 5 in response to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief.

Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should so notify Region 5. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted in accordance with 18 U.S.C. §1001. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501, et seq.

If you have any questions regarding this matter, please contact Patrick Kuefler of my staff, at (312) 353-6268. Your response should be sent to the U.S. Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Patrick Kuefler.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Lorna M. Jereza". The signature is stylized with large, flowing loops and is written over the typed name.

Lorna M. Jereza, P.E., Chief  
Illinois/Indiana Section  
Enforcement and Compliance Assurance Branch

cc: Todd Marvel, IEPA



bcc: Section copy  
Branch copy

DE-9J/PK:be/7/29/99/filename:a:sheffieldsteel.wpd

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
<i>PK 7/29/99</i>					
AUTHOR/ TYPIST	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
<i>PK 8/2/99</i>			<i>HP for Lorna Jerem 08/02/99</i>		



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

IN THE MATTER OF:	)	
	)	
SHEFFIELD STEEL CORPORATION	)	Information Request Pursuant
ONE INDUSTRY AVENUE	)	to Section 3007 of the
JOLIET, ILLINOIS 60434	)	Recovery Act, as amended,
	)	42 U.S.C. §6927
EPA ID No.: ILD 151 759 248	)	Resource Conservation
	)	and Recovery Act
CONTACT: Mr. Frank Di Falco	)	
Operations Manager	)	

This is a request by the United States Environmental Protection Agency (U.S. EPA) issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The issuance of this request requires Sheffield Steel Corporation (SSC) to submit information relating to the hazardous waste generated, stored, or treated at its facility located at one Industry Avenue, Joliet, Illinois 60434. U.S. EPA has determined that this information is necessary to ascertain the facility's compliance status with the standards for hazardous wastes generated, treated, stored, or disposed, as set forth at 40 CFR Parts 260 through 270. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501, et seq.

**I. INSTRUCTIONS**

This request for information pertains to any and all information your company may have regarding the applicability of and



conformance with the RCRA. If any information that we require is not available or accessible in the full detail requested, then you must provide the best information available. The request also requires the production of all information called for in as detailed a manner as possible based upon such information as is available or accessible, including, where specific information is not available or accessible, an estimate and explanation of the method by which each estimate is made. The information must be provided even though it may be characterized as confidential information or trade secrets. You are entitled to assert a claim of confidentiality pursuant to 40 CFR Part 2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes, or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. You must request confidential treatment when you provide the information since any information that you do not identify as confidential will not be accorded this protection by the Agency and may be released to the public without further notice.

Any written statements submitted pursuant to this request must be accompanied by a notarized affidavit from a responsible company



official or representative that those statements are true and accurate to the best of the signatory's knowledge and belief. If you learn, at any time after submittal of the requested information, that any portion of this submittal certified as true is false or misleading, you should notify U.S. EPA. If any information submitted under this information request is found to be untrue or misleading, the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

The information requested herein must be provided, within thirty (30) days following receipt of this request, to the United States Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, Attention: Patrick Kuefler.

## **II. DEFINITIONS**

1. "Treatment" means treatment as defined in 40 CFR §270.2.
2. "Storage" means storage as defined in 40 CFR §270.2.
3. "On-site" means on-site as defined in 40 CFR §260.10.
4. "Discharge or hazardous waste discharge" means storage as defined in 40 CFR §260.10.
5. "Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units



(e.g., one or more landfills, surface impoundments, or combinations of them). See 40 CFR §260.10.

6. "Generator" means on-site as defined in 40 CFR §260.10.

7. "Hazardous waste" means hazardous waste as defined in 40 CFR §261.3.

8. "Hazardous waste constituents" means hazardous waste as defined in 40 CFR §260.10.

9. "Management or hazardous waste management" means management as defined in 40 CFR §260.10.

10. "And" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

### **III. REQUEST FOR INFORMATION**

1. Provide copies of any reports developed to assess the actual or potential contamination of soils or groundwater at the site including any phase I and phase II assessment reports developed or completed for the site.

2. Provide copies of waste analysis required by 35 I.A.C. §722.111 [40 CFR §262.11] including Material Safety Data Sheets (MSDS) and analytical results of any tests performed to determine the presence of hazardous wastes or hazardous waste constituents in the materials listed below:

a) Discarded refractory brick including any gunning material used (See photos 10-12). Provide MSDSs for each type of refractory brick used on-site.



- b) Discarded 1 & 5-gallon containers of material located within the spent refractory brick waste pile.
- c) Mill scale from waste water drying beds.
- d) spilled oils shown in Photos 15 and 16.
- e) Material stored in rusted drums depicted in photos 5, 6, & 7.

Include a description of sampling methodologies, and quality assurance/quality control procedures utilized with the sampling activities.

3. Provide a description of the status of any soil and/or groundwater investigation at the site and plans for further investigation and/or remediation at the site; specifically:

- a) Spills located outside the Oil Room (See Photo 9 enclosed).
- b) Refractory brick piles (See photos 10-12)
- c) Releases as stained soils shown in photos 15 and 16.
- d) Spilled oil and grease on ground and concrete pad.  
(See photo 17)
- e) Stained soil at the waste water treatment plant.

4. Hazardous waste manifests generated during 1997, 1998, and 1999.

5. Provide a copy of the current storm water discharge permit for the facility.

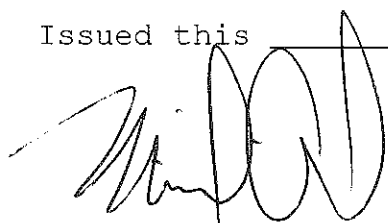
6. Provide the following notarized certification by a responsible company officer:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in



responding to this information request. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Issued this Second day of August, 1999

 for Lorna Jereza

Lorna M. Jereza, P.E., Chief  
Illinois/Indiana Section  
Enforcement and Compliance Assurance Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF:	)	
	)	
Mr. Frank Di Falco	)	Information Request Pursuant
Operations Manager	)	to Section 3007 of the
Sheffield Steel Corporation	)	Recovery Act, as amended,
One Industry Avenue	)	42 U.S.C. §6927
Joliet, IL 60434	)	Resource Conservation and
	)	
EPA ID No.: ILD 151 759 248	)	

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information called for in as detailed a manner as possible based upon such information as is available or accessible, including, where specific information is not available or accessible, an estimate and explanation of the method by which each estimate is made. The information must be provided even though it may be characterized as confidential information or trade secrets. You are entitled to assert a claim of confidentiality pursuant to 40 CFR 2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes, or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. You must request confidential treatment when you provide the information since any information that you do not identify as confidential will not be accorded this protection by the Agency and may be released to the public without further notice.

Any written statements submitted pursuant to this request must be accompanied by a notarized affidavit from a responsible company official or representative that those statements are true and accurate to the best of the signatory's knowledge and belief. If you learn, at any time after submittal of the requested information, that any portion of this submittal certified as true is false or misleading, you should notify U.S. EPA. If any information submitted under this information request is found to be untrue or misleading, the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code. U.S. EPA has



the authority to use the information requested herein in an administrative, civil, or criminal action.

The information requested herein must be provided, within thirty (30) days following receipt of this request, to the United States Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, Attention: Patrick Kuefler.

## **II. DEFINITIONS**

1. "Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them). See 40 CFR 260.10.

2. "Generator" means on-site as defined in 40 CFR 260.10.

3. "Hazardous waste" means hazardous waste as defined in 40 CFR 261.3.

4. "Hazardous waste constituents" means hazardous waste as defined in 40 CFR 260.10.

5. "Management or hazardous waste management" means management as defined in 40 CFR 260.10.

6. "And" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.



7. The term "you" or "Respondent" shall mean the addressee of this Information Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, successors, assigns, subsidiaries, and agents.

8. The term "person" as used herein includes, in the plural as well as the singular, any person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.

9. The terms "furnish", "describe", or "indicate" shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.

10. The term "identify" means, with respect to a person, to set forth his full name, present or last known business address, the name of that employer and a description of the job responsibilities of such person.

11. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.) organization, if any, and a brief description of its business.



12. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number (invoice or purchase order number), if any, the identity of the author, addressor, addressee and/or recipient, and the substance of the subject matter.

13. As used here, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by the way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements, and the like, diary, calendar, desk pad, scrap book, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, inter-office or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc, or disc pack; and any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, tape or other type of memory and together with printouts of such punch card, disc or disc pack, video tape or other type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like of it, (c) drafts, (d) attachments



to or enclosures with any documents and (e) every document referred to in any other document.

14. "Hazardous waste" means any solid waste that may meet the definition of a hazardous waste as defined under Section 1004(5) of RCRA.

### **III. REQUEST FOR INFORMATION**

1. In response to Question 1, d, of the August 3, 1999, request for information you state that "Sheffield plans to have the stained soils in the area sampled and remediated in accordance with all applicable local, state, and federal laws". Please provide information about your sampling and remediation activities including, but not limited to, the timetable for sampling and remediation of the area, the sampling parameters, analytical methods, and action levels, and the laws that you believe may be and/or are applicable to the release, sampling and remediation of the area. Please provide a copy of all workplans and quality assurance plans developed to address the stained soil and the name of the engineering or environmental consultant hired to perform the work.

2. In your response to Question 3, a, of the August 3, 1999 request for information, you state that "Sheffield plans to remove the oil-stained soils, and have a certified environmental engineering company sample and test the soils. These soils will be disposed of pursuant to all applicable local, state, and federal regulatory requirements." Please provide information about your sampling and remediation activities including, but not limited to, the timetable for sampling and remediation of the area, the sampling parameters,



analytical methods, and action levels, and the laws that you believe may be and/or are applicable to the release, sampling and remediation of the area. Please provide copies of all documents which discuss or relate to the oil-stained soils, including, but not limited to, releases, sources of releases, sampling, and sample analyses and clean up activities. Please provide a copy of all workplans and quality assurance plans developed to address the oil stained soils and the name of the engineering or environmental consultant hired to perform the work.

3. In response to Question 3, a., of the August 3, 1999 request for information, you state that the spilled oil was from a gear box that over flowed as the result of an "unusually heavy storm event". Please provide the dates of the storm event and spill, and provide copies of all reports and data which discuss and quantify the amounts of rain and material spilled.

4. Please provide the date(s) of the oil and grease spill at the concrete pad located next to the refractory brick piles at the Eastern boundary of the facility.

5. Please state whether or not Sheffield does, or has ever removed and/or recovered oil from either the cooling water tanks or the mill scale collection basin. If so, please describe when and how this recovery process began and when, if ever, this process was suspended.

6. In your response to Question 3, b., of the August 3, 1999 request for information, you state that the refractory brick will be remediated and hauled to a non-hazardous landfill. Please provide the name and location of the landfill that will be used, the sampling parameters and criteria, and analytical methods as well as the timetable



for the sampling and removal. Please provide a copy of all workplans and quality assurance plans developed to address the refractory brick remediation and the name of the engineering or environmental consultant hired to perform the work.

7. Also, in your response to Question 3, d., of the August 3, 1999 request for information, you state that "Sheffield plans to have a certified environmental engineering company steam clean the concrete pad." Please provide information concerning the nature and extent of the spills, and future remediation methods, including, but not limited to, the timetable for cleaning the pad and the removal and testing of residue and water from the operation, and the name and address of the contractor responsible for this clean up activity. In addition, please state which laws you have determined to be applicable to this release, sampling and remediation of the area. Please provide a copy of all workplans and quality assurance plans developed to address the cleaning of the concrete pad and the name of the engineering or environmental consultant hired to perform the work.

8. In response to Question 3, e., of the August 3, 1999 request for information, you state that "Sheffield plans to have a certified environmental engineering company sample the stained soils observed near the mill scale cooling tank and remediate these soils in accordance with all applicable local, state, and federal regulatory requirements." Please provide information as to the timetable for sampling of the stained areas and state the laws that you believe are applicable to the release, sampling and remediation of the area. Please provide a copy of all workplans and quality assurance plans developed to address the



stained soil located near the scale cooling tank and the name of the engineering or environmental consultant hired to perform the work.

9. The material supplied in response to the August 3, 1999, request for information reflects that the mill scale containment basin and associated tanks are not included in the November, 1994 storm water pollution prevention plan. Please state all the reasons for excluding these areas from the storm water pollution prevention plan.

10. On page 8 of your September 21, 1999 letter, you stated that "Because the Illinois RCRA program operates in lieu of the Federal program, we believe that the resolution of our RCRA regulatory issues with the Illinois EPA fully resolves any concern that EPA may have." Please identify each RCRA regulatory issue you have identified to the Illinois EPA, or has been identified to you by Illinois EPA, and explain when, how and by whom, each issue was resolved. Please provide copies of all documents that purport to discuss or resolve each RCRA regulatory issue. Also, please provide the names of staff at the Illinois Environmental Protection Agency personnel that you contacted or that have been providing oversight for the assessment and remediation of the oil, grease and other spills.

11. Provide the following notarized certification by a responsible company officer:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request. Based on my review of all relevant documents and inquiry of those individuals



immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Issued this \_\_\_\_\_ day of \_\_\_\_\_, 1999

Lorna M. Jereza P.E., Chief  
Compliance Section 1  
Enforcement and Compliance Assurance Branch

